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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

By Hand

Mr. Thomas J. Sugrue
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 - 12th Street, SW
Washington, DC 20554

**Re: November 9, 2000 E911 Phase II Carrier Implementation
Report**

Dear Mr. Sugrue:

AT&T Wireless Services, Inc. ("AT&T"), has received several letters from the Bureau indicating that certain AT&T affiliates have failed to submit the above-referenced report. AT&T filed a Phase II E911 report on November 9, 2000, and an amended Phase II E911 report on December 6, 2000 (attached as Exhibit A). The November 9, 2000 Phase II E911 report listed one TRS number for AT&T and did not include TRS numbers for each AT&T affiliate. Therefore, attached as Exhibit B is a list of AT&T's affiliates that should be associated with the AT&T E911 Phase II E911 report.

If you have any questions concerning this filing, please do not hesitate to contact the undersigned. Thank you for your attention with this matter.

Sincerely,

Bryan T. Bookhard

Bryan T. Bookhard
Counsel for AT&T
Wireless Services, Inc.

Enclosures

cc: Wendy Austrie

DCDOCS:186224.1(3Z_W011.DOC)



**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Carrier Reports on Implementation)	CC Docket 94-102
Of Wireless E911 Phase II)	
Automatic Location Identification)	

**AT&T WIRELESS SERVICES, INC.
AMENDED E911 PHASE II REPORT**

On November 9, 2000, AT&T Wireless Services, Inc. ("AT&T") filed a report on its plans for implementation of wireless E911 Phase II automatic location identification ("ALI") systems.^{1/} In that Report, AT&T stated that it was not in a position to choose between a handset and network overlay solution, but it committed to filing an amended report as soon as possible regarding its choice of Phase II ALI technology and its continuing efforts to find a compliant solution. As a result of decisions now made regarding changes to AT&T's network, AT&T hereby submits its amended report.

INTRODUCTION

On November 30, 2000, AT&T announced that it is forming a strategic alliance with NTT DoCoMo, Japan's leading mobile communications company, to develop the next generation of mobile multimedia services on a global-standard, high-speed wireless network.^{2/} To speed the introduction of these new data services, AT&T will overlay a GSM (Global System for Mobile Communications)/GPRS (General Packet Radio Service) platform to its existing

^{1/} See AT&T Wireless Services, Inc. E911 Phase II Report, CC Docket No. 94-102 (filed Nov. 9, 2000).

^{2/} See Press Release, AT&T and NTT DoCoMo Announce Strategic Wireless Alliance (November 30, 2000).

nationwide TDMA network. The transition from the TDMA to GSM air interface will begin early next year.

This change will give AT&T's network higher speed data capabilities and its customers a wider array of mobile devices from the world's GSM vendors. Nevertheless, as the Commission doubtless recognizes, the expected transition -- falling at the same time as the Phase II report was due -- seriously complicated AT&T's plans regarding the most appropriate ALI technology. Until the decision about the DoCoMo transaction and the air interface change was final and announced to the public, AT&T was not in a position to choose between the various Phase II technologies.

As described in its November 9 Report, AT&T is fully committed to enhancing the safety of its subscribers and the communities it serves and, therefore, it continues to investigate every possible location service technology. After more than a year of testing and analysis, AT&T finds itself in agreement with most other carriers and public safety agencies that, ultimately, the best Phase II technology is handset-based. Handset technology has demonstrated the potential to be far more accurate than network-overlay solutions and it is considerably more adaptable to changing conditions. Unfortunately, however, the aggressive nature of the Commission's schedule for handset deployment has made it necessary for carriers to consider other, less optimal, interim solutions. As described below, AT&T has developed a Phase II implementation plan that it believes comes as close to meeting the Commission's requirements as any other proposed solution.

I. GSM Network

As noted above, AT&T's decision to change its air interface to GSM was based on its determination that such action would expedite the provision of the next generation of advanced wireless services to customers, in accordance with the Commission's oft-stated goals.^{3/} For purposes of E911 Phase II compliance, AT&T intends to deploy throughout its GSM network Enhanced Observed Time Difference of Arrival ("E-OTD") technology. E-OTD is a hybrid handset and network-based solution, which the Commission recently approved through a waiver to VoiceStream Wireless Corporation. As the Commission noted in that waiver order, E-OTD may be the only viable solution for GSM carriers.^{4/}

AT&T contemplates that it will make E-OTD available in its GSM network immediately upon its air interface change out. Specifically, AT&T has made requests to its vendors that the GSM infrastructure be E-OTD equipped when installed. AT&T intends to apply for any waivers that might be necessary when it has more information on its change-out schedule and the performance and accuracy of the E-OTD technology. AT&T also plans to use GPS-equipped handsets as soon as they are commercially available from AT&T's equipment vendors.

^{3/} See, e.g., News Release, Press Statement of Chairman William E. Kennard on Spectrum Requirements for Advanced Wireless Services (rel. October 13, 2000) ("We look forward to working with the Executive Branch in our respective spectrum management roles to ensure that the American public has widespread and timely access to the next generation of advanced wireless services."); News Release, Industry Settlement Advances Standards Process for Third Generation Wireless Services (rel. March 26, 1999) (Chairman Kennard noted that settlement of a patent dispute "will allow for a speedier deployment of exciting wireless broadband services for the benefit of consumers.").

^{4/} Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Fourth Memorandum Opinion and Order, FCC 00-326, at ¶ 56 (rel. Sept. 8, 2000).

II. TDMA Network

During the phase-out of AT&T's TDMA network, it makes sense to have a consistent solution across air interfaces for a number of reasons. First, the burden of implementing multiple solutions in different markets -- and possibly in different areas of the same market -- has the serious potential to slow the deployment of Phase II technology to all AT&T customers. As the Commission is aware, the move from Phase I to Phase II service is a monumental task and likely will demand resources far beyond those currently contemplated. Contending with two different sets of vendors and two completely different technologies could put an unbearable strain on those resources.

Second, the PSAPs' relationship with AT&T could be undermined if PSAPs are expected to contend with an ever-changing Phase II solution. During the initial years of Phase II deployment, PSAPs and carriers will have to work very closely to ensure that their systems are coordinated, that PSAPs have the appropriate equipment in the 911 network, and that the appropriate amount of testing and trouble-shooting occurs. Accommodation by PSAPs of two different Phase II technologies used by one carrier is, by itself, difficult enough. This problem would be compounded if the carrier's E911 technology choice changed based on schedules unrelated to E911 service (i.e., air interface change-outs).

Ultimately, AT&T is concerned that its use of inconsistent Phase II technologies would have an adverse effect on the safety of its customers. Accordingly, AT&T is investigating the use of E-OTD for its TDMA, as well as its GSM networks. Based on its preliminary analysis, E-OTD appears to be a promising solution in this circumstance. If AT&T decides to implement this technology for its TDMA network, it will seek any waivers that might be required at that time.

Nevertheless, AT&T is continuing to pursue all the activities regarding network-based solutions described in its November 9 Report, and remains committed to finding a solution that will bring Phase II E911 service to its customers in the shortest possible timeframe. In this regard, AT&T will complete its TDOA/AOA network-overlay trial with Grayson Wireless in Denver and its RadioCamera [TM] Location System trial with US Wireless Corporation in Seattle.

As AT&T noted in its November 9 Report, when complete, the Denver trial the trial will involve the installation of Grayson equipment in 29 AT&T base stations, 25 with TDOA antennas and four with AOA antennas. Both AMPS and IS-136 TDMA air interfaces will be included, and test environments will include urban, suburban, rural, highway corridor, and indoor locations. The Seattle trial will begin this month, the goal of which will be to evaluate the performance of the US Wireless technology in a realistic field test environment, representing a wide range of operating environments and test conditions. Testing will include a large number of test calls from both stationary points and mobile routes, and will be conducted for both the AMPS and IS-136 TDMA air interfaces.

These trials, together with those already conducted by AT&T, are designed to permit AT&T's team, the PSAPs, vendors, and the Commission to gain crucial information about the performance and system impacts of the various network-overlay solutions. While a fair amount of testing of Phase II systems is underway today, no end-to-end system has yet been deployed. Prior to such deployment, it is important for all affected parties to obtain as much information as possible so that consumers end up with the most viable solution as quickly as possible.

For example, in its initial Report, AT&T explained that, although still ongoing, the expanded Denver trial has already yielded some important information regarding the substantial

challenges associated with use of AOA antennas. These large antennas have caused substantial loading/capacity problems for some existing base stations, requiring removal and replacement of the support structure. In addition, the size of AOA antennas has generated opposition and concern on the part of property owners (the landowners from whom AT&T rents land for its base stations) and zoning authorities.

To prepare for these challenges, AT&T conducted an exhaustive review of local zoning requirements and attempted (in cooperation with the vendor) to select sites for the AOA antennas that would encounter minimal delay. Nevertheless, experience to date in the Denver trial has indicated that the zoning necessary for placement of AOA antennas typically requires five months (four months of zoning clearance and one month for securing the necessary building permit). Moreover, the uncertainty associated with landowner-related delays introduces additional challenges to timely deployment.

Unforeseen complexities such as these have arisen in every AT&T Phase II trial, and AT&T believes this experience is not unique to its testing scenarios. Although many problems can be overcome, it is necessary that they be taken into account prior to full-scale Phase II deployment. For this reason, it is extremely important that the network-overlay location solution trials being conducted today continue and that as much information as possible (consistent with vendor-carrier non-disclosure agreements) be shared in a public forum.

CONCLUSION

AT&T intends to continue its work with vendors to identify the best Phase II solution possible for both its GSM and TDMA networks. At this point, AT&T believes that the benefits of deploying the same solution for both air interfaces outweigh the detriments. Accordingly,

unless its ongoing network-overlay trials demonstrate the superiority of a network-based solution, AT&T plans to implement E-OTD technology across its network.

Respectfully submitted,

AT&T WIRELESS SERVICES, INC.

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Of Counsel

December 6, 2000

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Exhibit B

Licensee	TRS Number
AT&T Wireless Services of Alaska, Inc.	807316
Cellular Alaska Partnership	804492
AB Cellular Holding, LLC	808269
AT&T Wireless Services of California, Inc.	816496
Bakersfield Cellular LLC	*
Bay Area Cellular Telephone Company	811732
Cagal Cellular Communications Corporation	811730
Napa Cellular Telephone Company	808629
Nevada County Cellular Corporation	*
Redding Cellular Partnership	816512
Salinas Cellular Telephone Company	811729
Santa Barbara Cellular Systems, Ltd	816514
Visalia Cellular Telephone Company	816516
Yuba City Cellular Telephone Company	816518
AT&T Wireless Services of Colorado, Inc.	816498
Fort Collins-Loveland Cellular Telephone Co.	803796
Greeley Cellular Telephone Company	803793
Litchfield Acquisitions Corporation	809465
AT&T Wireless Services of Florida, Inc.	803060
Bradenton Cellular Partnership	803757
Melbourne Cellular Telephone Company	803778
Ocala Cellular Telephone Company, Inc.	803760
Sarasota Cellular Telephone Company	803754
AT&T Wireless Services of Hawaii, Inc.	807834
Citrus Cellular Limited Partnership	803784
AT&T Wireless Services of Idaho, Inc.	805332
Boise City Cellular Partnership	805335
First Cellular Group of Shreveport, Inc.	803064

* TRS Number not available in FCC's Carrier Locator

Louisiana 1 Joint Venture	803062
Monroe Cellular Limited Partnership	803067
Atlantic Cellular Telephone of Delaware, LLC	817972
Piscataqua Cellular Telephone of Delaware, LLC	817974
AT&T Wireless Services of Minnesota, Inc.	803097
Rochester CellTelCo	803100
St. Cloud Cellular, Inc.	803103
M. C. Cellular	808496
AT&T Wireless Services of Nevada, Inc.	816520
Reno Cellular Telephone Company	807832
NJ-2 Cellular, Inc.	811092
Binghamton CellTelCo	806948
Cellular Telephone Company	802911
Vanguard Binghamton, Inc.	806947
McLang Cellular, Inc.	803488
Orange County Cellular Telephone Corp.	806982
AT&T Wireless Services of Tulsa, Inc.	808782
Midwest Cellular Telephone Company	808758
OK-3 Cellular, Inc.	808759
OK-5 Cellular, Inc.	808755
AT&T Wireless Services of Oregon, Inc.	807615
Hood River Cellular Telephone Company, Inc.	803790
Medford Cellular Telephone Company, Inc.	807618
Salem Cellular Telephone Company	807612
McCaw Communications of Johnstown, Inc.	803487
Pennsylvania Cellular Telephone Corp.	806973
Pittsburgh Cellular Telephone Company	803496
AT&T Wireless Services of San Antonio, Inc.	803082
Longview Cellular, Inc.	803073
McCaw Comm of Gainesville, TX, Inc.	806386
Metroplex Telephone Company	811252

* TRS Number not available in FCC's Carrier Locator

Northeast Texas Cellular Telephone Company	811254
Texarkana Cellular Partnership	803070
Texas Cellular Telephone Company Ltd Partnership	803061
AT&T Wireless Services of Utah, Inc.	816504
Provo Cellular Telephone Company	805341
AT&T Wireless Services of Washington, Inc.	816506
Bellingham Cellular Partnership	807309
Bremerton Cellular Telephone Company	807312
Olympia Cellular Telephone Company, Inc.	807321
Spokane Cellular Telephone Company	807330
Yakima Cellular Telephone Company	807336
West Virginia Cellular Telephone Corp.	806949
Wheeling Cellular Telephone Company	803493
Texas RSA 11B	818450
Texas RSA 10B4	818446
California RSA #4 Limited Partnership	807345
Sioux City MSA Limited Partnership	805281
Iowa RSA #11	*
Houston MTA, L.P.	*
AT&T Wireless PCS of Philadelphia, LLC	816492
AT&T Wireless PCS of Cleveland, LLC	816494
Eclipse PCS of Indianapolis, LLC	*
Crystal Communications, Inc.	816508
Omega Cellular Partnership LC	816510

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